

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DARRELL LECKIE,

Plaintiff,

-against-

DEBBIE NAPOLI, R.N. (Provider No. 280), JORDAN LAGUIO, M.D (Provider No. 104), KHONDKAR RAKIB, D.D.S (Provider No. 703), TAMMY HYATT, RDH, and JOHN-JANE DOE 1-10 NEW YORK STATE DEPARTMENT OF CORRECTION AND COMMUNITY SUPERVISION Medical Providers, and JOHN-JANE DOE 11-20 NEW YORK STATE DEPARTMENT OF CORRECTION AND COMMUNITY SUPERVISION Correction Officers, "DOE" ADA COMPLIANCE OFFICER; "DOE" IGP SUPERVISOR, "DOE" DEPUTY SUPERINTENDENT FOR PROGRAMS, "DOE" DEPUTY SUPERINTENDENT FOR ADMINISTRATION, "DOE" staff members of IGRC, all defendants individually and in their official capacities;

Defendants.

x

**NOTICE OF CROSS
MOTION TO
CONSOLIDATE**

21 Civ. 7212 (PGG)

x

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiff's Cross-Motion, by his attorneys, Katherine E. Smith, and Anna Berezovski, move this Court before the Honorable Paul G. Gardephe, United States District Judge, for an Order pursuant to Fed. R. Civ. P. 42(a)(2), for an order consolidating this case and a related case Leckie v. City of New York et al., 19-cv-06719 (PGG)(RWL), and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that plaintiff filed his pre-conference letter motion to discuss plaintiff's anticipated motion to consolidate this case with with a related case that is currently pending in the Southern District before Your Honor, *Darrel Leckie v.*

City of New York, et al., 19-cv-06719 (PGG) on January 4, 2022 (Dkt. No. 25), and defendants filed their opposition letter on January 11, 2022 (Dkt. No. 25). Plaintiff served Defendants with a copy of the Memorandum of Law in Support of Plaintiff's Cross-Motion along with their Opposition to Defendants' Motion to Dismiss on March 24, 2022.

Dated: New York, New York
March 24, 2022

Respectfully submitted,

_____/s/_____
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